Voting Precincts—Establishment—Indians—Citizenship.—State ex rel. Tompton et al. v. *Denoyer et al., County Com'rs*, 72 N. W. Rep. (N. D.) 1014. Indians and persons of Indian descent, residing on lands allotted to them in severalty, and upon which preliminary patents have been issued, in accordance with the "Dawes Bill" passed by Congress in 1887, are citizens of the United States and qualified electors of the State, and it was the duty of the county commissioners of the county in which such lands are situated to establish a voting precinct within and for said lands. The "Dawes Bill" declares that such Indians "shall have the benefit of and be subject to the laws, both civil and criminal, of the State or Territory in which they reside." For a similar case see *State* v. *Norris*, 55 N. W. (Neb.) 1086.

Towns—Orders—Validity—Power of Boards.—Goodwin v. *Town of East Hartford et al.*, 38 Atl. Rep. (Conn.) 877. The board "for the care, maintenance and control" of a highway across a river, provided for by Act May 19, 1887, was to consist of the first selectmen of the towns designated as specifically benefitted by the highway; was authorized to apportion among the towns the expense of repairing and maintaining the same, as well as any damages resulting from its defective condition; and was declared by the act to be, for the purposes thereof, a body politic and corporate. *Held*, such board has no implied power to employ agents to procure legislation whereby the act of 1887 sbould be repealed, the State to assume the duty of repairing and maintaining the highway; nor has it power to issue orders binding on the towns for the expenses of such agents. This is true whether the board be considered as a municipal corporation, or simply as a device to enable the representatives of the towns to perform a municipal duty imposed on the towns jointly. In *Farrell* v. *Town of Derby*, 58 Conn. 234, 20 Atl. 460, it was held that a town may lawfully expend money it has raised by taxation to protect its corporate integrity, etc., from adverse legislation. But the doctrine of this case must not be stretched into an authority justifying a town to embark in legislative attacks on other corporations, because the town might think itself benefitted thereby.

Criminal Law—Instructions—Error—Reasonable Doubt.—Hoffman v. *State*, 73 N. W. Rep. (Wis.) 51. *Held*, error to define "reasonable doubt," in instructing a jury in a murder trial, as an "intelligent opinion or conviction that the guilt of defendant has not been satisfactorily proven." Such instruction is vicious in that it seems to minimize the significance of a mere doubt by saying that, in order to be reasonable, the doubt must rise above the condition of a mere doubt into a realm of certainty and conviction.

Nuisance—Liability of Tenant—Lease for Years.—Meyer v. *Harris et al.*, 38 Atl. Report (N. J.) 690. The lessee of a term for years is not liable to third persons for damages caused by his maintaining upon the demised premises in the condition in which it was at the beginning of the term a structure which is a nuisance. The remedy is against the owner. But where the tenant is a lessee for a term of 999 years he is, for all practical purposes (*Black* v. *Canal Co.*, 24 N. J. Eq. 465), the owner thereof, and third persons may have their remedy against him for maintaining such nuisance.